

David Newman (Bar No. 246351)
david@tilg.us
THE INTERNET LAW GROUP
9100 Wilshire Boulevard, Suite 725E
Beverly Hills, CA 90212
tel. (310) 910-1496

Joseph J. Zito (*pro hac vice*)
jzito@whitestone.law
WHITESTONE LAW
1850 Tower Crescent Plaza, Suite 550
Tysons, Virginia 22182
Telephone: 202-466-3500

Former Attorneys for Non-party AiPi, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendants.

Case No. 4:22-cv-01490-JST

**REQUEST FOR CORRECTION OF
THE DOCKET AND ENTRY OF
TERMINATION AS COUNSEL FOR
NON-PARTY AIPI**

JUDGE: HON. JON S. TIGAR
DATE:
TIME:
CTRM:

Former counsel of record for non-party AiPi, Joseph J. Zito and former local counsel for non-party AiPi, David Newman, hereby respectfully request that the Clerk of Court, pursuant to DE#278, correct the docket to properly reflect the termination of both Mr. Zito and Mr. Newman as counsel for non-party AiPi.

In addition, Mr. Zito also requests that the docket be corrected to no longer inaccurately indicate that Mr. Zito is counsel for Party Valjakka. Mr. Zito is improperly

listed on the docket as counsel for Party Valjakka, despite the withdrawal of Mr. Zito's pro hac request, DE#218.

THE COURT DOCKET:

The current docket of this matter, attached hereto as Exhibit A, lists the following counsel of record for non-part AiPi:

Interested Party
AiPi, LLC

represented by **Joseph J Zito**
(See above for address)
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

David Michael Newman
The Internet Law Group
9100 Wilshire Blvd.
Suite 725e
Beverly Hills, CA 90212
310-910-1496
Email: david@tilg.us
ATTORNEY TO BE NOTICED

Both counsel should be listed as TERMINATED.

On March 14, 2024, this Court Ordered that lead counsel for Non-Party AiPi, Whitestone Law was disqualified from continuing representation of AiPi. [DE#278]

In the Court's March 14 Order, DE#278, the Court also denied counsel's Motion to Withdraw, DE#272 as moot. DE#272 included both Mr. Zito and Mr. Newman's withdrawal. By dismissing DE#272 as moot based upon the Order of DE#278, the Court terminated both Mr. Zito and local counsel Mr. Newman from this matter.

The current docket, Exhibit A, also incorrectly lists Mr. Zito as counsel of record for Plaintiff Valjakka:

Plaintiff

Lauri Valjakka

represented by **Erick Scott Robinson**

Spencer Fane LLP
3040 Post Oak Blvd., Suite 1300
Houston, TX 77056
713-498-6047
Email: erobinson@spencerfane.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joseph J Zito
DNL Zito Castellano
1250 Connecticut Avenue, NW
Ste 700
Washington, DC 20036
202-466-3500
Email: jzito@dnlzito.com
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Although Mr. Zito filed a motion to appear pro hac for Plaintiff Valjakka, DE#208, that motion was never granted and was withdrawn DE#218.

10/25/2023	208	MOTION for leave to appear in Pro Hac Vice for Plaintiff (Filing fee \$ 317, receipt number BCANDC-18776816.) filed by Lauri Valjakka. (Attachments: # 1 Exhibit Cert Good Stand DC)(Zito, Joseph) (Filed on 10/25/2023) (Entered: 10/25/2023)
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11/06/2023	218	Notice of Withdrawal of re 208 MOTION for leave to appear in Pro Hac Vice for Plaintiff (Zito, Joseph) (Filed on 11/6/2023) (Entered: 11/06/2023)
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CONCLUSION:

Counsel therefore respectfully requests correction of the Docket in this matter to properly reflect the Terminated status of counsel Mr. Zito and Mr. Newman.

1 AiPi remains a non-party and technically does not need counsel in this matter at this
2 time.

3 Undersigned counsel has circulated this Request for Correction to all counsel of
4 record. Counsel has indicated that there is no objection.

5 For the foregoing reasons, Counsel respectfully requests that the Court grant its
6 Request for Correction of the record.

7
8 DATED: March 29, 2024

9 /s/ David Newman

10 David Newman
11 THE INTERNET LAW GROUP
12 9100 Wilshire Boulevard, Suite 725E
13 Beverly Hills, CA 90212
14 tel. (310) 910-1496

15 /s/ Joseph J. Zito

16 Joseph J. Zito (*pro hac vice*)
17 WHITESTONE LAW
18 1850 Tower Crescent Plaza, Ste 550
19 Tysons, Virginia 22182
20 Telephone: 202-466-3500
21 Former Attorneys for Non-party AiPi, LLC

22 CERTIFICATE OF CONFERENCE

23 I hereby certify that I conferred with the all counsel of record and that none are
24 opposed to the request.

25 CERTIFICATE OF SERVICE

26 Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel
27 of record who have appeared in this case are being served on this 29th day of March,
28 2024, with a copy of the foregoing via ECF filing.

29 /s/ Joseph J. Zito

30 JOSEPH J. ZITO